

REMARKS

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Claims 2-9 and 11-18 are pending in the application. Claims 2-9 and claim 11-18 stand rejected. Reconsideration of the application is respectfully requested. The Examiner's rejections are addressed in substantially the same order as in the referenced office action.

Claims 2-9 and 11-18 stand rejected as being anticipated by U.S. Patent 5,350,189 to Tsuchitani et al. (the '189 reference). Applicant respectfully traverses, because the examiner has not presented a prima facie case of anticipation.

Each claim in the present application includes the limitation of **one or more re-entrant grooves**, and the limitation is clearly defined in the application as a groove in an element that is larger toward the element center than at the element surface. The specification goes on to provide the benefit of such a groove in that the narrower cross-section at the electrode surface tends to preserve electrode surface area while the wider cross-section below the electrode surface reduces resistance to fluid flow. The disclosure states beginning at page 44 line 1, "As illustrated in FIGS. 14 and 15, the re-entrant grooves 1405, 1410, 1415, and 1420 have a narrower cross-section at the electrode surfaces and a wider cross section below the electrode surfaces. **The narrower cross-section at the electrode surface tends to preserve electrode surface area while the wider cross-section below the electrode surface reduces resistance to fluid flow.**" The art of record does not teach such re-entrant grooves and the disclosed structures in the art do not provide the above-stated advantages.

The grooves 7 in the '189 reference have the opposite cross section structure. The grooves 7 are clearly narrower toward the center of the structure 4 than at the structure surface. Therefore, the '189 reference does not teach or suggest a re-entrant groove as claimed, and does not teach a structure providing the advantages of the claimed re-entrant


grooved structure. Consequently, the reference fails to teach each and every limitation of the rejected claim(s) as required for anticipation.

CONCLUSION

For all the foregoing reasons, Applicant respectfully submits that all remaining claims are in a condition for allowance and requests timely issuance of a notice of allowance. No fee is believed due for this response. The Commissioner is authorized to charge any additional fee due or refund any overpayment to **Deposit Account No. 13-0010 (IO-1002-US)**.

Respectfully submitted,

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